



St. Croix | St. Thomas | St. John | Water Island

www.viwma.org

September 27, 2024

Ada I. Garcia-Rivera, Esq.
Clerk of the Court
United States District Court for the District of Puerto Rico Jose V.
Toledo U.S. Courthouse
300 Recinto Sur St., Suite 325 San
Juan, Puerto Rico 00901

RE: In the matter of the Complaint of :
Third Lady LLC
For the Exoneration from Limitation of Liability, as owners of the M/V
BONNIE G
USDC-PR Civil No. 2024-cv-1169
O/F:654-2

To Whom it May Concern:

Virgin Islands Waste Management Authority (VIWMA) entrusted Third Lady LLC (Bonnie G) to transport “**Fifteen (15)Ventis Pro 5 Mx4 Multi-Gas Monitors**” from St. Croix, USVI to St. Thomas, USVI on or about October 3, 2023. Due to improper equipment and negligence of the crew of the Bonnie G, four (4) out of the fifteen (15) of the Ventis Pro 5 Mx4 Multi-Gas Monitors suffered water damage.

The Ventis Pro 5 Mx4 Multi-Gas Monitors are lifesaving safety devices utilized by the VIWMA’s employees. The damage to the four (4) Ventis Pro 5 Mx4 Multi-Gas Monitors, renders the gas monitors unsafe and improper to be utilized by the VIWMA.

VIWMA losses total as follows:

- \$4,400.00-Ventis Pro 5 Mx4 Multi-Gas Monitors
- \$320.00-Shipping and Handling

Attached are receipts which show the above referenced cost incurred and lost by the VIWMA. The VIWMA is requesting Third Lady LLC (Bonnie G) be deemed responsible. Please advise if any additional information is required to be provided.

Respectfully,

Akeem Charleswell
Environmental Health and Safety Officer
Virgin Islands Waste Management Authority
7410 Estate Bovoni Bay 2
St. Thomas, VI 00802
acharleswell@viwma.org

• CC: Manuel Sosa; Sosa, Carvajal, & Velez-Rive, PSC



PALADIUS

Paladius International LLC
110 Calle La Cambija Bayamon, PR 00961
(787) 786-1555 | sales@paladius.com

Invoice

DATE	INVOICE#
09/26/2023	116471
www.paladius.com	

BILL TO:

Virgin Islands Waste Management Authority
Denise E. H. Lewis
RR1 6196 Estate Glynn
Kingshill, 00850
U.S. Virgin Islands

SHIP TO:

Virgin Islands Waste Management Authority
SHANA GILBERT
VIWMA
#252 Estate Glynn
Kingshill, VI 00850

Customer PO Number	003586
Sales Order	SO-02575
Sales Rep	Peter Dahlstrom
Billing Due Date	9/26/2023
Incoterms	DAP - Delivered at Place
Amount Due	\$27,410.00

PRODUCT CODE	PRODUCT DESCRIPTION	QUANTITY	UNIT PRICE	TOTAL
9007-VTS-K12321011C	Ventis MX4, LEL (Pentane), CO, H2S, O2, Li-ion Ext Range, Desktop Charger, Without Pump, Orange, UL/CSA, English	30.00	\$903.00	\$27,090.00
FREIGHT	Freight (Shipping & Handling)Split shipment to STX and STT	1.00	\$320.00	\$320.00

USPS Tracking Number:
9406 1036 9930 0028 2742 54

Sub-Total	\$27,410.00
Sales Tax	\$0.00
Total	\$27,410.00
Amount Paid	(\$0.00)
Credit Amount	(\$0.00)
Amount Due	\$27,410.00

PO Box 9023592 San Juan, PR 00902-3592 - Pier 10, Puerta de Tierra
Tel: 787-723-4114 - Fax: 787-724-4354 - Email info@normahfreight.com
www.normahfreight.com

"A family name serving the Caribbean for over 40 years"

Date Received	Voyage Number	Fr. Prepaid	Collect	COD	Bill of Lading Number
10/3	BL-102		0	J	FSHP 720

CONSIGNEE VIWMA
Akeem Charleswell

DECLARED VALUE:

\$ _____

TELEPHONE #: 474-7762

Quantity	Description, Marking, Packaging	Weight	Cu. Meters	Rate	Charges
1 box	Gas Monitor			25.41	25
TOTALS					

THE RECEIPT, CUSTODY, CARRIAGE, DELIVERY AND TRANSHIPPING OF THE GOODS ARE SUBJECT TO THE TERMS APPEARING ON THE FACE AND BACK HEREOF

Carrier: STEVENS FORMEL FREIGHT SERVICES LLC

REMARKS

Count and check cargo before signing. No claims will be allowed after cargo has been loaded and left the dock.

Consignee Acceptance of Delivery

Authorized Signature

ALL CHARGES ARE DUE UPON DELIVERY OF CARGO TO CONSIGNEE

	PAID	NOT PAID	CASH	CHECK NO.	DATE
FRT.		6			10/10
COD					

Any cargo not cleared by Customs and/or not picked up at dock by the end of a working day will be given to our respective agents. Any clearance, transfer or storage cost will be for account of consignee. We will make every attempt to reach consignee by telephone. However cargo not collected within five (5) working days after discharge will be considered unclaimed and will be disposed of accordingly.

This Bill of Lading is your invoice
000002

